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12/27/01  
JRM

IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

GREENE/GUILFORD ENVIRONMENTAL  
ASSOCIATION, a non-profit corporation  
incorporated under the laws of the  
Commonwealth of Pennsylvania, CITIZENS  
FOR PLANNED COMMUNITY GROWTH,  
an unincorporated association organized  
under the laws of the Commonwealth of  
Pennsylvania, PAUL B. AMBROSE, JOHN G.  
ENDERS, CHARLES F. RAHAUSER, BETSY  
RAHAUSER, DOUGLAS A. WARNOCK, U.X.  
VAGNERINI, THOMAS W. BUNDY,  
STEPHEN P. BUCHER, ROGER J.  
ROBERTSON, JAMES A. STRITE, JR., DAVID  
A. GUTHRIE,

Plaintiffs

v.

KEN WYKLE, Administrator, Federal  
Highway Administration, ROBERT GATZ,  
Federal Highway Administration,  
Defendants

and

BRADLEY L. MALLORY, Secretary for  
The Department of Transportation,  
Commonwealth of Pennsylvania,  
Intervenor.

CIVIL ACTION NO.  
1:CV-01-0910

(Judge Rambo)

FILED  
12/27/01  
JRM

MOTION FOR ENLARGEMENT OF TIME

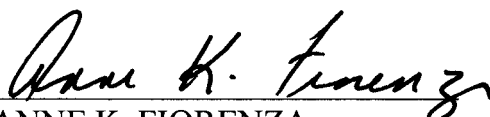
Defendants Ken Wykle and Robert Gatz (Federal Defendants) and intervenor  
Bradley L. Mallory, by and through their undersigned counsel, hereby move this Court for  
an enlargement of time in which to respond to plaintiffs' Motion to Supplement the  
Record and, in support thereof, state as follows:

1. This is a citizens' challenge to the decision of the Federal Highway Administration to construct a new interchange in the Chambersburg area.
2. On or about December 12, 2001, plaintiffs filed a motion to supplement the record:
3. Defendants and intervenors must respond on or before December 31, 2001;
4. Because of the intervening holidays, and because defendants' counsel has been, and will continue to be involved in a mediation during the time this motion is pending, counsel respectfully asks this Court to grant an enlargement of time through January 7, 2001.

Wherefore, defendants respectfully ask that the Court grant this motion for enlargement of time.

Respectfully submitted,

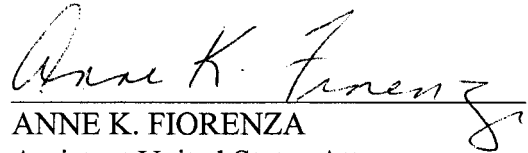
MARTIN C. CARLSON  
United States Attorney

  
ANNE K. FIORENZA  
Assistant United States Attorney  
Federal Building, 2<sup>nd</sup> Floor  
228 Walnut Street, PO Box 11754  
Harrisburg, PA 17108-1754  
Phone: 717-221-4482  
Fax: 717-221-2246

DATE: December 26, 2001

**CERTIFICATE OF CONCURRENCE**

I, Anne K. Fiorenza, hereby certify that on December 21, 2001 I spoke to Thomas A. Linzey, Esquire, counsel for the plaintiff. Mr. Linzey concurs in this motion.

  
ANNE K. FIORENZA  
Assistant United States Attorney

Date: December 26, 2001

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that she is an employee in the Office of the United States Attorney for the Middle District of Pennsylvania and is a person of such age and discretion to be competent to serve papers.

On this 26<sup>th</sup> day of December, 2001, she served a copy of the foregoing document by placing said copy in a postpaid envelope addressed to the person hereinafter named, at the place and address stated below, which is the last known address, and by depositing said envelope and contents in the United States Mail at Harrisburg, Pennsylvania to:

Thomas Alan Linzey, Esquire  
Community Environmental Legal Defense Fund  
2859 Scotland Road  
Chambersburg, PA 17201

  
REBECCA A. PLESIC  
Legal Secretary